Department of Energy
Ohio Field Office
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, NY 14171-9799

Recd.
Rec. Mgmt.
January 29, 2001

DW:2001:0067

January 26, 2001

Mr. Robert R. Campbell, President
West Valley Nuclear Services Company
10282 Rock Springs Road
West Valley, NY 14171-9799

ATTENTION: J. R. Gerber, Environmental Affairs Manager, AOC-24

SUBJECT: Environmental Checklist OH-WVDP-2000-06 National Environmental Policy Act Documentation for Proposed Asbestos Abatement Activities From West Valley Nuclear Services Company Facilities

REFERENCE: WD:2000:0933 (75467), J. R. Gerber to A. C. Williams, "National Environmental Policy Act (NEPA) Documentation for Proposed Asbestos Abatement Activities from WVNS Facilities," dated December 21, 2000

Dear Sir:

The Ohio Field Office West Valley Demonstration Project (OH/WVDP) National Environmental Policy Act (NEPA) Compliance Officer has reviewed the subject environmental checklist and determined that the action described therein is categorically excluded from the requirement to prepare additional NEPA documentation in the form of either an Environmental Assessment or Environmental Impact Statement.

Enclosed is a signed Environmental Checklist/Action Description Memorandum Form and attachment to the Environmental Checklist.

Sincerely,

Daniel W. Sullivan
NEPA Compliance Officer

Enclosure: Environmental Checklist/Action Description Memorandum Form and Attachment

cc: J. L. Drake, OH/WVDP, WV-DOE, w/o enc.
M. N. Maloney, OH/WVDP, WV-DOE, w/enc.

DWS:0108 - 75848 - 451.7

DWS/slb

Dan

Westinghouse

WEST VALLEY NUCLEAR SERVICES COMPANY

10282 ROCK SPRINGS ROAD
WEST VALLEY, NEW YORK 14171-9799
PHONE (716) 942-4885/FAX (716) 942-465

Alice C. Williams, Director
U. S. Department of Energy
West Valley Demonstration Project
10282 Rock Springs Road
West Valley, New York 14171-9799

WD:2000:0933
AOC-24
December 21, 2000

ATTENTION: D. W. Sullivan

Dear Ms. Williams:

SUBJECT: National Environmental Policy Act (NEPA) Documentation for Proposed Asbestos Abatement Activities from WVNS Facilities

Attached please find Environmental Checklist, OH-WVDP-2000-06, "Asbestos Abatement Activities from WVNS Facilities," (Attachment A). The checklist has undergone environmental review in accordance with the WVNS Company Policy, WV-986, *Environmental Review Program.*

A Categorical Exclusion (CX) is recommended for the proposed action. Asbestos abatement falls within the class of actions described in Title 10 Code of Federal Regulations (CFR) as Amended, part 1021, Subpart D, Appendix B, CX B1.16, "Removal of Asbestos from Buildings."

If you concur with this recommendation, please sign and return to me the attached Environmental Checklist, Section D, *Recommendation and Determination*, (Form WV-3736). If you have any questions or comments, please feel free to contact me at extension 4885 or Bob Fussner, of my staff, at extension 4048.

Very truly yours,

WEST VALLEY NUCLEAR SERVICES CO.

J. R. Gerber, Manager
Environmental Affairs

IB:2000:0323

JRG:RJF:bnm

Attachments: Environmental Checklist OH-WVDP-2000-06, "Asbestos Abatement Activities from WVNS Facilities" (10 pages, including checklist form WV-3737)

75467

Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

Project/Activity Title: Asbestos Abatement Activities from WVNS Activities	**NEPA ID Number:** OH-WVDP-2000-06 **Rev. #:** 0 **Date:** 12/13/00
Contractor Project Manager: J. O. Lopez	**Phone Number:** (716) 942-2066
Contractor NEPA Coordinator: R. J. Fussner	**Phone Number:** (716) 942-4048
OH/WVDP NEPA Document Manager: D. W. Sullivan	**Phone Number:** (716) 942-4016

A. BRIEF PROJECT/ACTIVITY DESCRIPTION: Attach a detailed description or statement of work.

B. SOURCES OF IMPACT: Would the action involve, generate, or result in changes to any of the following?

	YES	NO		YES	?
1. Air Emissions	X		12. Water Use Diversion	X	
2. Liquid Effluents	X		13. Water Treatment	X	
3. Solid Waste	X		14. Water Source Modification		X
4. Radioactive Waste Soil	X		15. Radiation, Toxic Chemical Exposures		
5. Hazardous Waste		X	16. Pertinent Historical Use		
6. Mixed Waste		X	17. High Energy, Source Facilities		X
7. Chemical Storage/Use	X		18. Transportation	X	
8. Petroleum Storage/Use		X	19. Noise Level	X	
9. Asbestos	X		20. Workforce Adjustment		
10. Utilities	X		21. Other		X
11. Clearing or Excavation		X			

In an attachment, qualify and explain each question that you have specifically answered "YES."

C. CATEGORY EVALUATION CRITERIA: Would the proposed action:

	YES	?
1. Take place in an area of cultural or historic significance?	X	
2. Create hazardous, radioactive or mixed waste for which no disposal is available?		X
3. Impact a RCRA-regulated unit or facility?	X	
4. Force a low income or ethnic minority population to shoulder a disproportionate share of the negative environmental impacts of pollution or environmental hazards because of a lack of political or economic strength?		X
5. Involve air emissions and be located in an air pollutant non-attainment or maintenance area for any criteria pollutants?		X
6. Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, including DOE orders or Executive Orders? (i.e., require any federal, state or local permits, approvals, etc.)	X	
7. Involve radioactive substances, pollutants or contaminants that pre-exist in the environment such that there would be uncontrolled or unpermitted releases?		X
8. Require siting, construction, or major expansion of a waste storage, disposal, recovery, or treatment facilities, but may include such categorically-excluded facilities?		X
9. Adversely affect environmentally sensitive resources including, but not limited to: floodplains or archeological, historic or architectural significance; threatened or endangered species or their habitat; wetlands; wildlife refuges; agricultural lands or vital water resources (e.g., drinkable aquifers)?		
10. Involve extraordinary circumstances? As specified at 10 CFR § 1021.410 b (2), extraordinary circumstances are unique situations presented by specific proposed actions, such as scientific controversy about the environmental effects of the action, uncertain effects or effects involving unique or unknown risks, or unresolved conflicts concerning alternate uses of available resources within the meaning of Section 102 (2) (E) of NEPA. 42 U.S.C. 4332 (2) (E).		X
11. Be "connected" to other actions with potentially significant impacts, related to other cumulative significant impacts, and precluded by 40 CFR § 1506.1 or 10 CFR § 1021.211?		X

In an attachment, qualify and explain each question that you have specifically answered "YES."

U.S. Department of Energy (DOE)
Ohio Field Office, West Valley Demonstration Project (OH/WVDP)

ENVIRONMENTAL CHECKLIST

D. RECOMMENDATION AND DETERMINATION

DOE OH/WVDP Director's Recommendation: I find and recommend that this proposed action meets the criteria specified in 10 CFR § 1021, Subpart D, and/or DOE Policy and Guidance for the following:

[X] Categorical Exclusions (Appendix B, Class of Action B.1.16)
[ ] Actions Within the Scope of Existing NEPA Documentation
NEPA Document ID Number_____)
[ ] On-going Operations (Standard Operating Procedure OH-6.1.01, Rev. 1, Section 5.2)

Signature: _____ for M.C. Williams Date 1/25/01
Director, Ohio Field Office,
West Valley Demonstration Project (OH/WVDP),
Department of Energy

DOE OH/WVDP NEPA Compliance Officer's Determination: Based on my review of the attached information concerning this proposed action, as the OH WVDP NEPA Compliance Officer (DOE Order 451.1A, Section 5.d.), I have determined that the proposed action fits within the specified class of actions, that the other regulatory requirements identified in Section C are met, and that this proposed action proceed without further NEPA review.

Signature: _____ Date 1-25-2001
OH/WVDP NEPA Compliance Officer,
West Valley Demonstration Project

OR

[ ] Environmental Assessments Appendix C, Class of Action _____; or Action not listed in Subpart D)
[ ] Environmental Impact Statements Appendix D, Class of Action _____
[ ] Interim Actions (40 CFR § 1506.1 and 10 CFR § 1021.211)
[ ] Integrated Documentation for CERCLA/RCRA Actions
[ ] Variances (Emergency Action, 40 CFR § 1506.11 and 10 CFR § 1021.34)

DOE-OH NEPA Compliance Officer's Concurrence: I concur with the recommendation that this proposed action fits within the specified class of actions.

Signature: _____ Date _____
NEPA Compliance Officer,
Ohio Field Office,
Department of Energy

DOE-OH Manager's Determination: Based on my review of the attached information concerning this proposed action, as the Head of the Ohio Field Office (DOE Order 451.1A, Section 5.a.), I have determined that the level of documentation recommended for the proposed action is appropriate.

Signature: _____ Date _____
Manager, Ohio Field Office,
Department of Energy

Attachment to Environmental Checklist OH-2000-06
Asbestos Abatement from WVNS Facilities

SECTION A. PROJECT/ACTIVITY DESCRIPTION

1.0 BACKGROUND

The Main Plant Process Building, and supporting structures, contain significant quantities of Asbestos Containing Material (ACM) as piping insulation and building materials, i.e. floor and roofing materials. Much of the ACM in the process areas and aisleways of the facilities has various levels of radioactive contamination.

Asbestos management and abatement on operating process components and to repair degrading insulation and material has been performed during the course of the West Valley Demonstration Project (WVDP) as part of routine maintenance. Now that the site is nearing the completion of HLW processing, the Project focus is turning to decontamination of the facilities used to support solidification activities. Asbestos abatement activities on out of service components and lines, undertaken to support and prepare areas for decontamination, are not routine maintenance activities.

The purpose of this checklist is to provide the NEPA analysis for site-wide asbestos abatement, including significant removal from out-of-service piping and components conducted in conjunction with, or as a precursor to decontamination activities.

2.0 TYPE AND SCOPE OF ACTIVITY

Although the asbestos abatement project could take place throughout the site, it is projected that up to 95% of the removal activity will be conducted in the Main Plant Process building (including the Utility Room), especially from pipe runs in aisleways and areas that provide future manned access into process cells and rooms. The first project identified under this checklist is removal of approximately 400 linear feet of ACM from the process and utility piping in the Off-gas Aisle (OGA) of the Main Plant Process building. Since this is a generic checklist, subsequent projects may be identified in annual updates (see 4.0, Schedule and Timing). The primary objective of the Asbestos Removal project is to improve worker safety through the identification, sampling, verification, labeling, glove bagging, wrapping, removing/repairing, or encapsulating any ACM and or suspect ACM.

The technologies to be used in the abatement of ACM at the WVDP have been developed and utilized for numerous Operations and Maintenance projects over the past several years, i.e. asbestos removal as part of building modifications, asbestos removal or repair during process and utility line/equipment repair, and removal or repair of degraded asbestos insulation or building materials. These activities have NEPA analysis via checklist OH-WVDP-2000-01, "Site-wide Routine Maintenance Activities."

The Asbestos Management Plan, WVDP- 072, section 5.1.2, "Response Actions", generically describes the abatement technologies as:

1. Operations and Maintenance (training, labeling programs, etc.)
2. Repair (corrective actions to control fiber release)
3. Enclosure (erecting an air/dust-tight physical barrier)
4. Encapsulation (applying a chemical sealant)
5. Removal (the only permanent solution for damaged/friable asbestos)

The same technologies will be applied for the activities covered by this checklist, except that the asbestos to be abated will often be on unused, out-of-service, components or lines. The project(s) will be asbestos abatement as a precursor activity to future site Decontamination and Decommissioning (D&D), i.e. remove asbestos prior to initiating large-scale decontamination work to provide a greater level of protection to the D&D workers. In these cases, the removal of asbestos may include "wrapping and cutting". The asbestos on the affected pipe or component is wrapped or otherwise fixed, and the entire pipe or component is removed in whole.

ACM removal projects will take a phased, disciplined approach to defining and completing its scope, utilizing the following guidance documents:

- WV-127, "Project Definition and Control"
- WVNS Guidebook for Managing Projects (TR803)
- Westinghouse Project Management Guidelines
- PMBOK, A Guide to the Project Management Body of Knowledge
- DOE 430.1 LCAM Good Practices Guide

3.0 PURPOSE AND NEED

WVDP is transitioning from HLW Processing to decontamination activities. Exposure to airborne asbestos poses environmental and occupational health concerns. Removal of ACM as a precursor to area D&D activities needs to be performed to reduce the occupational risk to the site workers and to eliminate the need for maintenance of insulation on process and utility pipes that are no longer in service.

The Asbestos Management Plan, WVDP-072, includes in the definition of Potential Significant Damage, circumstances in which the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. The Plan further states that removal of asbestos containing material is required prior to demolition of any building.

4.0 SCHEDULE AND TIMING

The asbestos abatement projects covered by this checklist will be on-going to correspond with the WVDP's transition from HLW processing to D&D activities. The first activities are anticipated to be in the Off-Gas Aisle of the Main Plant Process building, starting in the first quarter of fiscal year 2001. Consistent with DOE Standard Operating Procedure OH-6.1.01, "National Environmental Policy Act Compliance," the generic site-wide asbestos abatement checklist will be updated annually, beginning in late CY 2001.

SECTION B SOURCES OF IMPACT

1. **Air Emissions**: Asbestos emissions management is required to be performed in accordance with the Clean Air Act, as regulated by 40 CFR 61, National Emission Standards for Hazardous Air Pollutants (NESHAPS).

2. **Liquid Effluents**: Plant water is used in personnel decontamination step of asbestos removal. This liquid is passed through at least a 5.0 micron filtration unit prior to release to the Low Level Waste Treatment Facility. Approximately 7200 gallons of wastewater from personnel decontamination is forecast over the duration of the OGA insulation removal, estimated at 60 days of actual field work.

3. **Solid Waste**: N.A. ACM removal under this project checklist will be performed primarily within the Main Plant Process building, and will therefore be considered Low-Level Waste (LLW).

4. **Radioactive Waste**: During ACM removal in plant areas, radioactive contamination is likely to be encountered both as surface contamination and as migrated into the ACM materials in levels exceeding 10 CFR 835 Appendix D limits. This will result in the generation of low-level radioactive waste. The initial project identified under this checklist is removal of ACM in the Off-gas Aisle to allow further decontamination activities to progress in the associated areas. The volume of ACM in the OGA is estimated at 400 linear feet.

5. **Hazardous Waste**: Hazardous waste is not routinely generated during ACM removal and is not expected during the initial project in the OGA. (Asbestos is not considered RCRA hazardous waste according to 6NYCRR 371 and 40 CFR 261.) Identification of hazardous waste in future activities will be on a case by case basis, relying on the Integrated Safety Management System processes such as hazard screens and waste characterization during project planning.

6. **Mixed Waste**: No mixed waste is expected to be generated because asbestos is not a RCRA hazardous waste. (See Item 5 above.)

7. **Chemical Use/Storage**: A non-hazardous surfactant is used in combination with water to wet ACM prior to removal. The current surfactant is Super Water Wetter, manufactured by Abatement Technologies.

8. **Petroleum Storage/Use:** N/A

9. **Asbestos**: The Asbestos Management Plan, WVDP-072, table 5.2.3.10 lists volumes of asbestos by Main Plant Process building area. All areas totaled is approximately 9000 square feet (assumes 1 square foot is equal to 1 linear foot). The OGA is listed as 500 linear feet.

   The asbestos will be abated in accordance with 12 NYCRR Part 56, "Asbestos," as amended November 9, 1994, and approved site specific variances: 29 CFR 1926.1101, "Asbestos," and 6 CFR 61, Subparts A & M, "National Emission Standards for Hazardous Air Pollutants".

   WVNS holds a New York State Department of Labor (NYSDOL) Asbestos Contractors license for asbestos activities performed by WVNS personnel. All WVNS personnel performing asbestos related activities must hold current NYS Department of Health certified training for the specific class of work to be completed. This training requires an annual refresher. All asbestos workers and engineers must also have a valid NYSDOL asbestos handling certificate appropriate to the work performed by such person.

10. **Utilities**: Prior to dismantling or removing any line or component, sources of energy (electric, steam, etc.) and process fluids will be isolated, drained, and locked out to ensure the safety of personnel performing the work.

11. **Clearing or Excavation:** N/A

12. **Water Use/Diversion**: Water with surfactant will be used to wet the asbestos during removal operations. Approximately 1 gallon of water is used per 10 feet of ACM removed. The water, which is absorbed into the asbestos, will be bagged and disposed. Plant water is used during the personnel decontamination step of the process. The shower

head flow rate is approximately 2 gallons per minute. An ACM removal job of 500 feet would generate approximately 7200 gallons of liquid from decontamination showers over a 60 day period.

13. **Water Treatment**: Personnel decontamination water is passed through a minimum 5.0 micron filter prior to release to the LLW2 interceptor system.

14. **Water Course Modification:** N/A

15. **Radiation/Toxic Chemical Exposures**: Radiation exposure rates in the accessible areas of the Main Plant Process building range from <1 to 30 mR per hour and contamination levels from <1 to 100 times the surface contamination limits in 10 CFR 835, Appendix D. The exposure rate and contamination levels within the OGA are consistent with these ranges.

16. **Pesticide/Herbicide Use:** N/A

17. **High Energy Source/Explosive:** N/A

18. **Transportation**: Radiation levels for all repackaged waste would be within applicable DOT limits (49 CFR 173 and 177). Waste containers would be labeled and transported on-site in accordance with SOP 300-07, "On-site Waste Generation, Packaging and Transportation." Before any radioactive waste container could be transported off-site, limits and requirements set forth in 49 CFR 173, "Subpart I - Radioactive Materials," and 10 CFR 71, "Packaging and Transport of Radioactive Material," would be met.

    Hazardous and mixed waste shipments would have to meet the manifesting requirements set forth in 40 CFR 262, "Standards Applicable to Generators of Hazardous Waste" and 6NYCRR 372, "Hazardous Waste Manifest System and Related Standards for Generators, Transporters, and Facilities." All waste shipments would be in accordance with the requirements for shipments specified in 49 CFR 100-177, "Transportation," and 6NYCRR 381, "Transporters of Low-Level Radioactive Waste."

19. **Noise Level**: WVDP areas with noise levels exceeding established decibel levels are posted to require hearing protection in accordance with the Industrial Hygiene and Safety Manual, WVDP-011. Job specific activities, such as the use of power cutting tools, will be analyzed during work procedure development by Hazard Control Specialists per EP-5-002, Work Instruction Preparation, and controls established accordingly.

20. **Workforce Adjustment:** N/A

21. **Other:** N/A

SECTION C CATEGORY EVALUATION CRITERIA

1. Take place in an area of previous or on-going disturbance?

The proposed action would take place in a facility of previous disturbance. Certain areas of the Main Plant Building underwent some early decontamination effort in the 1980's in preparation for solidification activities. Some decontamination work, and other routine maintenance activities have been on-going throughout the solidification phase.

3. Impact a RCRA regulated unit or facility?

The WVDP site includes numerous RCRA regulated hazardous waste management units, including the Analytical and Process Chemistry Laboratories in the Main Plant Building. Additionally, as part of the Corrective Action under RCRA 3008(h) Consent Order, the WVDP RCRA Facility Investigation (RFI) report, WVDP-RFI-016, "Sealed Rooms Paper Characterization", identified several rooms within the Plant as Solid Waste Management Units (SWMUs). Asbestos abatement in areas providing access and/or services to these RCRA regulated units may be performed.

6. Require any federal, state or local permits, approvals, notifications, etc?

The proposed abatement activities will not threaten a violation of applicable statutory, regulatory, or permit requirements. Any permit modifications or notifications that could be required are discussed below:

a) NESHAPS - There will be no impact to 40 CFR 61 Subpart H NESHAP Permits or monitored sources. Asbestos must be removed, handled, and disposed in accordance with 40 CFR 61 NESHAP for asbestos.

b) SPDES - A SPDES permit application and NYSDEC approval for the use of any water treatment chemicals, which are not already approved or listed on the most current WVDP SPDES permit, may also be necessary. Filing of a SPDES permit application or notification of discharge increase is not anticipated as the annual release of personnel decontamination wastewater is expected to be well within the 30,000 (+/- 20,000) gallons per year reported in the most recent SPDES application.

c) Asbestos Notifications - WVNS must submit asbestos project notifications to EPA NESHAPS and NYSDOL when the amount of asbestos to be removed is greater than 260 linear feet or 160 square feet. Notifications must be submitted at least 10 working days prior to the start of the project. If delay of the project occurs after the submittals of the notifications are made, amended notifications with the new start date must be submitted prior to the original start date. The final air monitoring clearance results to NYSDOL must also be submitted for projects requiring notifications.

SECTION D RECOMMENDATION AND APPROVAL

A Categorical Exclusion is recommended for the proposed action. The proposed action is within the scope of Title 10, Code of Federal Regulations (CFR) 1021, as amended, Subpart D, Appendix B, CX B1.16, Removal of Asbestos from Buildings:

> "Removal of asbestos-containing materials from buildings in accordance with 40 CFR part 61 (National Emission Standards for Hazardous Air Pollutants), subpart M (National Emission Standard for Asbestos); 40 CFR part 763 (Asbestos), subpart G (Asbestos Abatement Projects); 29 CFR part 1910, subpart I (Personal Protective Equipment), §1910.134 (Respiratory Protection); subpart Z (Toxic and Hazardous Substances), §1910.1001 (Asbestos, tremolite, anthophyllite and actinolite); and 29 CFR part 1926 (Safety and Health Regulations for Construction), subpart D (Occupational Health and Environmental Controls), §1926.58 (Asbestos, tremolite, anthophyllite, and actinolite), other appropriate Occupational Safety and Health Administration standards in title 29 chapter XVII of the CFR, and appropriate state and local requirements, including certification of removal contractors and technicians."

The proposed action meets the eligibility criteria for application of CX B1.16. The action would not:

1. threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including all requirements of DOE Orders.

2. require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities.

3. adversely affect environmentally sensitive resources.

Additionally, the proposed action would not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be an uncontrolled or unpermitted release.

Finally, no extraordinary circumstances exist that would affect the significance of the action, and the action is not connected to other actions with potentially or cumulatively significant impacts (40 CFR 1508.25(a)(1) and (2), respectively.

SUPPORTING DOCUMENTATION

WVDP-072	Asbestos Management Plan
40 CFR 261	Identification and Listing of Hazardous Wastes
6 NYCRR 371	Identification and Listing of Hazardous Wastes
49 CFR 100-177	U. S. Department of Transportation, "Transportation," dated October 1, 1992
40 CFR 1500-1508	U. S. Council on Environmental Quality, "Council on Environmental Quality Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act," dated July 1, 1996
10 CFR 1021	U. S. Department of energy, "National Environmental Policy Act Implementing Procedures: Final Rule," dated July 9, 1996
SOP 300-07	West Valley Nuclear Services Company, "On-site Waste Generation, Packaging, and Transportation," Revision 12, dated August 4, 2000.
SOP 15-44	West Valley Nuclear Services Company, "Asbestos Removal - Minor Projects," dated August 24, 2000
29 CFR 1926.1101	U. S. Occupational Safety and Health Administration, Construction Standards, "Asbestos", dated July 1, 1998.
40 CFR 61	U. S. Environmental Protection Agency, "National Emission Standards for Hazardous Airp Pollutants" (NESHAP), Subpart M, dated July 1, 1998
12 NYCRR Part 56	New York State Department of Labor, "Asbestos," as amended November 9, 1994

C. B. Banzer	AOC-24
B. A. Carpenter	WV-B1B
R. J. Fussner	AOC-24
J. R. Gerber	AOC-24
S. A. Giles	WV-B1E
J. J. Hoch	AOC-24
J. O. Lopez	WV-B1E